

ORIGINAL

OPEN MEETING AGENDA ITEM



0000091568

BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

MIKE GLEASON, Chairman
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2008 DEC -5 P 3: 59

Arizona Corporation Commission

DOCKETED

AZ CORP COMMISSION
DOCKET CONTROL

DEC -5 2008

DOCKETED BY

IN THE MATTER OF THE APPLICATION OF
WWC LICENSE LLC (WWC-ALLTEL
CORPORATION) FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS
CARRIER AND REDEFINITION OF RURAL
TELEPHONE COMPANY SERVICE AREA.

DOCKET NO. T-04248A-04-0239

REPLY TO WWC LICENSE LLC'S RESPONSE TO MOTION TO CLOSE DOCKET

The Arizona Local Exchange Carriers Association ("ALECA") hereby replies to "WWC License LLC's Response to ALECA Motion to Close Docket."

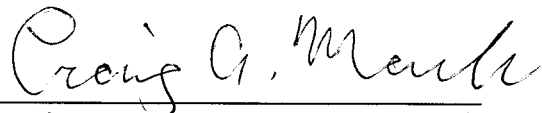
WWC License LLC ("Western") claims, without support, that two acquisitions (Western by Alltel, and Alltel by Verizon Wireless) are at the holding company level and will not affect Western's local operations. However, the Commission well knows that changes in control can have extensive effects on the acquired company. These can include changes in local management, local funding, local operations, local marketing efforts, and local commitments to low-income customers. All of these effects, and others, are relevant to whether a company should be designated as an Eligible Telecommunications Carrier. There is no record whatsoever concerning potential effects on Western of two changes of control.

Western also maintains, that it is premature to consider the FCC's requirement that Verizon Wireless phase out ETC funds. This is hard to understand. Western will soon be a subsidiary of Verizon Wireless and, as such will be ineligible for increased ETC funds. Western is effectively asking the Commission to increase the amount of ETC funds for which Verizon Wireless would be eligible at the same time that the FCC has ordered Verizon Wireless to eliminate its use of ETC funds.

1 Western finally claims that "Closing this docket now would effectively preclude any
2 potential receipt of ETC funds for use in Arizona through Western." This is incorrect. First,
3 Western does not deny that the record in this docket is stale. Second, it is Western that is largely
4 responsible for the staleness of this docket. Third, ALECA is not trying to preclude Western's
5 request. The problem is that the record in this docket has been overtaken by time, changes in
6 ownership, and FCC orders. If Western still wants to pursue designation as an ETC, the proper
7 course of action would be to file a new application in a new docket.

8 Again, it makes no sense to leave this docket open. The docket should be closed.

9 Respectfully submitted on December 5, 2008, by:

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23 **Original** and 13 copies **filed**
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31 **Copies** of the foregoing **mailed** on
32 December 5, 2008, to:

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40

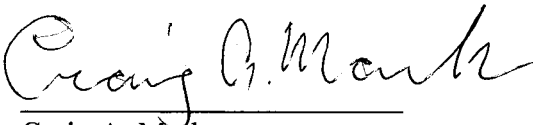
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